

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VENETIA KAPERNEKAS

Plaintiff,

-against-

UDO FRITZ-HERMANN BRANDHORST

-and-

THE BRANDHORST FOUNDATION

Defendants.

Case No. 08-cv-4046 (JSR)

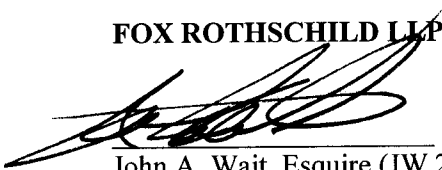
**NOTICE OF MOTION TO
ADMIT COUNSEL
PRO HAC VICE**

TO: Counsel on the Attached Service List

PLEASE TAKE NOTICE that upon the annexed affidavit of John A. Wait in support of this motion, and the Certificates of Good Standing annexed thereto, the undersigned will move this Court before the Honorable Jed S. Rakoff at the United States Courthouse for the Southern District of New York, pursuant to Local Rule 1.3(c) of the Local Rules of the United States District Courts for the Eastern and Southern Districts of New York, for an Order allowing the admission of Robert E. Goldman, a member of the firm of Fox Rothschild LLP, Stone Manor Corporate Center, 2700 Kelly Road, Suite 300, Warrington, PA 18976, telephone number (215) 918-3550, email address rgoldman@foxrothschild.com, and a member in good standing of the Bars of the States of Pennsylvania, New Jersey and Florida, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,

FOX ROTHSCHILD LLP


John A. Wait, Esquire (JW 2558)
100 Park Avenue, Suite 1500
New York, NY 10017
212-878-7900; Fax. 212-692-0940
jwait@foxrothschild.com

SERVICE LIST

Hollis Gonerka Bart, Esq.
Chaya Weinberg-Brodts, Esq.
Withers Bergman LLP
430 Park Avenue, 10th Fl.
New York, NY 10022

UNITED STATES DISTRICT COURT
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Defendants.

Case No. 08-cv-4046 (JSR)

**AFFIRMATION IN SUPPORT
OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

State of New York)
) ss:
County of New York)

John A. Wait, being duly sworn, hereby deposes and says as follows:

1. I am an associate at the law firm of Fox Rothschild, LLP, counsel for Plaintiff in the above captioned action, and am a member in good standing of the Bar of the State of New York, and the United States District Courts for the Southern and Eastern District of New York. I was admitted to practice law in the State of New York in 2006.
2. I am pleased to move for admission *pro hac vice* Robert E. Goldman, Esquire, a partner at the law firm of Fox Rothschild, LLP, a member in good standing of the Bar of the State of Pennsylvania, the Bar of the State of New Jersey and the Bar of the State of Florida, and an exemplary attorney. I have known Robert E. Goldman for more than one year.
3. Annexed hereto as Exhibits A, B and C are the Certificate of Good Standing from the State of Pennsylvania, the State of New Jersey and the State of Florida.
4. There are no pending disciplinary proceedings against Robert E. Goldman in any State or Federal court.

5. Wherefore I respectfully request that Robert E. Goldman be permitted to appear as counsel and advocate *pro hac vice* in this one case.


FOXROTHSCHILD LLP

John A. Wait, Esquire (JW 2558)
100 Park Avenue, Suite 1500
New York, NY 10017
212-878-7900; Fax. 212-692-0940
jwait@foxrothschild.com



Supreme Court of Pennsylvania

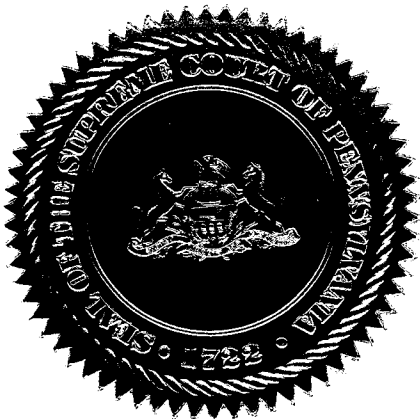
CERTIFICATE OF GOOD STANDING

Robert E. Goldman, Esq.

DATE OF ADMISSION

October 11, 1977

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: May 5, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey

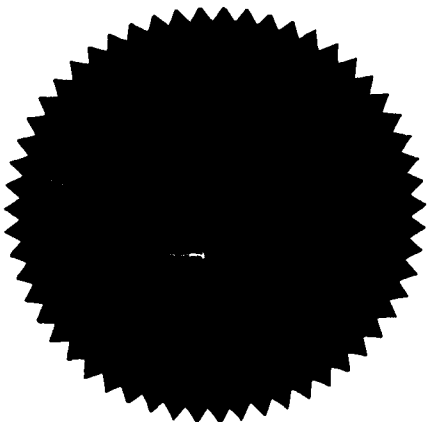


Certificate of Good Standing

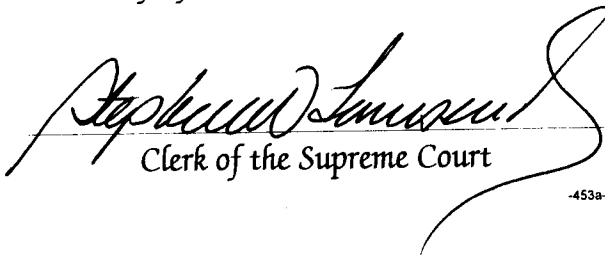
This is to certify that **ROBERT E GOLDMAN**
(No. **029581978**) was constituted and appointed an Attorney at Law of New
Jersey on **December 20, 1979** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
7TH day of May , 20 08


Clerk of the Supreme Court

Supreme Court of Florida

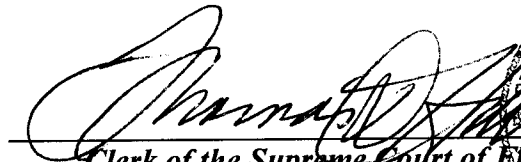
Certificate of Good Standing

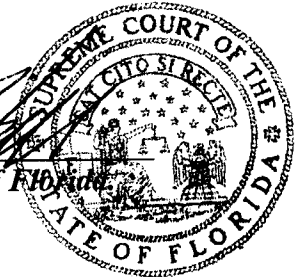
I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do hereby certify that

ROBERT EDWARD GOLDMAN

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on May 16, 1979, is presently in good standing, and that the private and professional character of the attorney appear to be good.

*WITNESS my hand and the Seal of the
Supreme Court of Florida at Tallahassee,
the Capital, this May 7, 2008.*


Clerk of the Supreme Court of Florida



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VENETIA KAPERNEKAS

Plaintiff,

-against-

UDO FRITZ-HERMANN BRANDHORST

-and-

THE BRANDHORST FOUNDATION

Defendants.

Case No. 08-cv-4046 (JSR)

**ORDER FOR ADMISSION
TO PRACTICE *PRO HAC*
VICE ON WRITTEN MOTION**

Upon the motion of John A. Wait, attorney for Plaintiff, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Robert E. Goldman
Fox Rothschild LLP
Stone Manor Corporate Center
2700 Kelly Road
Suite 300
Warrington, PA 18976
(215) 918-3550
rgoldman@foxrothschild.com

is admitted to practice *pro hac vice* as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: May __, 2008
New York, New York

United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VENETIA KAPERNEKAS

Plaintiff,

-against-

UDO FRITZ-HERMANN BRANDHORST

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AFFIDAVIT OF SERVICE

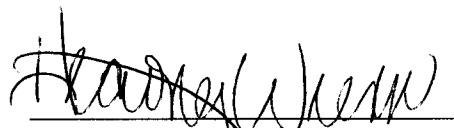
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

HEATHER WRENN, being duly sworn, deposes and says:

I am not a party to the action, am over 18 years of age and employed by Fox Rothschild LLP.

On May 21, 2008, I caused the Notice of Motion to Admit Counsel *Pro Hac Vice*, the Affirmation In Support of Motion to Admit Counsel *Pro Hac Vice*, with Exhibits, and the proposed Order for Admission to Practice *Pro Hac Vice* on Written Motion to be served via First Class Mail on the following:

Hollis Gonerka Bart, Esq.
Chaya Weinberg-Brodth, Esq.
Withers Bergman LLP
430 Park Avenue, 10th Fl.
New York, NY 10022


HEATHER WRENN

Sworn to before me this
21st day of May, 2008


Notary Public

FRED STEVENS
NOTARY PUBLIC-STATE OF NEW YORK
No. 02ST6037653
Qualified In New York County
My Commission Expires February 22, 2010